



# County of San Diego

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## **Eye Gnat Abatement Measure - Candidate for Validation – Irrigation Practices (Drip Irrigation Where and When Feasible)**

In accordance with 64.405(c) of Title 6, County Code of Regulatory Ordinances, the County of San Diego, Department of Environmental Health (DEH) arranged for two or more Professors of Entomology or similarly qualified person, not employed by the county, to review the effectiveness of candidate measures identified by the Farm and Home Advisor that have not been validated based on prior peer reviews. On April 30, 2013, a meeting, open to the public, was held for the review of "Irrigation Practices" which was identified by the Farm and Home Advisor as a candidate measure.

A written comment received prior to this meeting objected that some irrigation practices that DEH might consider validating would not be feasible for use on organic farms. No member of the public attended the public meeting and no further comments were received.

At the public meeting the Farm and Home Advisor clarified that the only "Irrigation Practice" he was presenting as a candidate measure was reducing the amount of water used on a farm and on a crop by utilizing drip emitters or drip tape during stages of the farming operation where the use of drip irrigation was feasible.

During the April 30, 2013 meeting, Dr. Alec Gerry and Dr. Dong-Hwan Choe of the University of California - Riverside, Department of Entomology were provided and considered the written comment referred to above, and considered the further comments of the Farm and Home Advisory. Dr. Gerry and Dr. Dong-Hwan Choe reviewed the potential of irrigation practices to likely be feasible and effective, and in what circumstances, be an applicable eye gnat abatement measure. Their review and discussion concluded that the use of drip irrigation whenever feasible, rather than overhead spray irrigation, would effectively reduce the eye gnat population since it has been previously demonstrated that reducing the moisture in the soil reduces fly populations. The reviewing professors also discussed that short-term overhead spray irrigation would be necessary at some stages of the farming process, e.g., when preparing fields for planting, and would not significantly reduce the benefits offered through long-term drip irrigation. The written comment letter expressed concerns with the short-term use of sprinklers and, measure allows the use of sprinklers for such uses.

Based on the discussion and conclusions of the reviewers, pursuant to §64.405(d), the Director's determination is to approve "the use of drip irrigation where and when feasible" as an applicable eye gnat abatement measure.



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Jack Miller, Director